

COHEN, FRANKEL & RUGGIERO, LLP

ATTORNEYS AT LAW

20 VESEY STREET, SUITE 1200
NEW YORK, NEW YORK 10007
(212) 732-0002 • FAX (212) 293-7224

MARK I. COHEN
PETER M. FRANKEL
LOUIS J. RUGGIERO
MINA KENNEDY
GILLIAN M. FEEHAN*

*ADMITTED IN NJ AND PENDING ADMISSION IN NY

35-07 90th STREET
JACKSON HEIGHTS, NEW YORK 11372
(718) 898-4900 • FAX (718) 898-0093
PLEASE DO NOT REPLY TO THIS OFFICE

December 21, 2021

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC # _____
DATE FILED: 12/22/2021

VIA ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

MEMO ENDORSED

**Re: *United States v. David Liranzo*
19 Cr. 663 (ER)**

Dear Judge Ramos:

Please recall that I represent Mr. David Liranzo in the above-referenced matter. Mr. Liranzo is presently scheduled for sentencing before Your Honor on January 7, 2022 at 11:00 a.m., and per Your Honor's Individual Rules, the defense's sentencing submission is due Friday, December 24, 2021. For the reasons that follow, I write to respectfully request that Your Honor grant a 30-day adjournment of the sentencing hearing and adjust the parties' respective sentencing submission deadlines accordingly. This is the defense's first sentencing hearing adjournment request in this matter. I have discussed this request with A.U.S.A. Nicholas Chiuchiolo, and the Government has no objection.

Preliminarily, the parties received the final draft of the United States Probation Presentence Report ("PSR") yesterday, December 20, 2021, at which time we immediately sent a copy to Mr. Liranzo for his review. The defense respectfully submits that it requires time to review the final report with Mr. Liranzo—especially Probation's sentencing recommendation and justification—prior to finalizing and submitting its sentencing letter. Further, Mr. Liranzo has been working diligently to obtain letters of support and records that will be included in the defense's sentencing submission, but he has faced some difficulty obtaining these documents due to the upcoming holidays. The defense respectfully submits that the requested adjournment would permit Mr. Liranzo the necessary time to obtain these important sentencing materials.

Therefore, I respectfully request a 30-day adjournment of Mr. Liranzo's sentencing hearing and request that the due dates for the parties' respective sentencing submissions be

The Honorable Edgardo Ramos
December 21, 2021
Page 2 of 2

adjusted to correspond with Mr. Liranzo's new anticipated sentencing date and in accordance with Your Honor's Rules of Practice. Thank you for your consideration.

Respectfully submitted,


Mark I. Cohen, Esq.

MIC/gmf

Cc: A.U.S.A. Nicholas Chiuchiolo (via ECF)
Mr. David Liranzo (via email)

Sentencing is adjourned to February 16, 2022 at 10 a.m. The deadlines for the sentencing submission are extended accordingly.

SO ORDERED.


Edgardo Ramos, U.S.D.J
Dated: 12/22/2021
New York, New York